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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:
	:
DELPHI CORPORATION, <u>et al.</u> ,	:
	:
Debtors.	:
	:
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DELPHI CORPORATION, <u>et al.</u> ,	:
	:
Plaintiffs,	:
	:
- against -	:
	:
BP, BP AMOCO CORP, BP MICROSYSTEMS	:
INC., BP PRODUCTS NORTH AMERICA,	:
CASTROL, CASTROL INDUSTRIAL	:
AND UNIFRAX CORP.	:
	:
Defendant.	:
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**MOTION FOR AN ORDER ADMITTING JAMES C. THOMAN,
PRO HAC VICE, PURSUANT TO LOCAL RULE 2090-1(b)**

Garry M. Graber hereby moves this Court, pursuant to Rule 2090-1(b) of the Local
Rules of Bankruptcy Procedure for the Southern District of New York, for an order admitting James

C. Thoman, *pro hac vice*, to appear and practice before this Court (the "Motion") as counsel for creditor *Unifrax I LLC f/k/a Unifrax Corporation*, Creditor to the Debtor. ("Unifrax") and in support thereof respectfully represents as follows:

1. I am a partner with the law firm, Hodgson Russ LLP, which maintains an office for the practice of law within the Southern District of New York at 60 East 42nd Street, New York, New York.

2. I am a member in good standing of the Bar of the State of New York and am admitted to practice before the Supreme Court of the State of New York and the United States District Courts and the United States Bankruptcy Courts for all four districts of New York.

3. Unifrax has retained the services of Hodgson Russ to represent them in the above matter. James C. Thoman is a partner with Hodgson Russ LLP. As set forth in the annexed affirmation in support of the Motion, Mr. Thoman is qualified and eligible for admission, *pro hac vice*, to appear and practice before this Court.

4. A copy of this Motion has been served upon the Office of the United States Trustee and, in light of the nature of the relief requested, the Creditor respectfully submits that no other or further notice is required.

WHEREFORE, the undersigned respectfully requests that the Court enter an order, substantially in the form annexed hereto as Exhibit A, (i) admitting James C. Thoman, *pro hac vice*, to appear and practice before this Court in all matters related to representation of Unifrax in these Chapter 11 proceedings; and (ii) granting such other and further relief as this Court may deem just and proper.

Dated: Buffalo, New York
January 6, 2011

Respectfully submitted,



/s/ Garry M. Graber

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